

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS  
STEVEN MONTEITH (USPS-T4) TO FIRST SET OF INTERROGATORIES OF  
NATIONAL NEWSPAPER ASSOCIATION NNA/USPS-T4-2(f)-(g) and 3  
(May 26, 2021)**

The United States Postal Service hereby provides the response of witness Steven Monteith to the above-listed interrogatories. Each interrogatory is stated verbatim and followed by the response. The remaining interrogatories have been redirected to witness Robert Cintron.

The Postal Service believes that NNA has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. § 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NNA in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NNA on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

Respectfully submitted,  
UNITED STATES POSTAL SERVICE

Anthony Alverno  
Chief Counsel, Global Business &  
Service Development

Amanda Hamilton

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1135  
202-268-4559  
Amanda.J.Hamilton@usps.gov  
May 26, 2021

## RESPONSES OF USPS WITNESS MONTEITH TO INTERROGATORIES OF NNA

### NNA/USPS-T4-2. \* \* \* \*

- f. In your view, do mail recipients have easy access to local postmasters, customer service representatives or any other representative to USPS if they wish to file a complaint or express concern about late delivery of any mailpiece other than packages? Please explain your response?
- g. If the proposed service standards are put into effect, does the Postal Service expect to provide an alert on this page to the general public that the service standards have been lowered?

### RESPONSE:

f.

Mail recipients have a variety of ways to file a complaint or express concern about late delivery of any mail piece other than packages. They can file complaints or express concerns to postmasters, delivery supervisors, the Customer Care Center, or local consumer affairs office. See *a/so* USPS Domestic Mail Manual, Section 608 Postal Information and Resources, at 6.1 Consumer Complaints and Inquiries (<https://pe.usps.com/text/dmm300/608.htm#ep1256084>).

g.

NNA characterizes the Postal Service's proposal as lowering service standards. However, the Postal Service's request for an advisory opinion notes that the proposal will improve the Postal Service's consistency and reliability from a service performance perspective, as well as increase the efficiencies of the transportation network.

Notwithstanding, to the extent that NNA inquires as to whether we will notify the public as to the proposal's implementation, we plan to issue alerts and other

## **RESPONSES OF USPS WITNESS MONTEITH TO INTERROGATORIES OF NNA**

communications when the proposal is implemented. We will also publish a final rule announcing the new service standards in the *Federal Register*.

## **RESPONSES OF USPS WITNESS MONTEITH TO INTERROGATORIES OF NNA**

**DFC/USPS-T4-3.** With respect to late delivery of newspapers,

- a. Do you believe the Postal Service has received an increased volume of complaints about late-delivered newspapers in FY 2020 and FY 2021? Please explain the basis of your response.
- b. Does the Postal Service receive reports from postmasters or letter carriers about late-delivered newspapers? If so, please describe the information that would appear in these reports.
- c. Does the Postal Service compile reports or any other data from consumer complaints on late delivery of newspapers under existing Service Standards filed or expressed to any other source within the postal system other than postmasters or letter carriers?
- d. Does the Postal Service expect to compile reports or any other data from consumer complaints on late delivery of newspapers under the new service standards?

### **RESPONSE:**

- a. Due to the service performance issues that we experienced during peak season, there was likely an increase volume of complaints for all products. However, we anticipate that the complaint volume will decrease following the proposal's implementation because we plan to deliver 95 percent of all mail on time, at all times of the year.
- b. While we do not receive regular reports from postmasters or letter carriers about late-delivered newspapers, there are instances where issues related to late delivery are brought to my attention and those reports can be initiated by letter carriers, postmasters, or mailers' organizations, such as NNA.
- c. The Postal Service does not compile reports or any other data from consumer complaints on late delivery of newspapers.

**RESPONSES OF USPS WITNESS MONTEITH TO INTERROGATORIES OF  
NNA**

- d. We have no plans currently to compile reports or any other data from consumer complaints on late delivery of newspapers under the new service standards.